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**So Ordered this 13th day of May, 2022**

A handwritten signature in black ink, appearing to read "Lois H. Goodman".

**Lois H. Goodman, U.S.M.J.**

May 5, 2022

**VIA EMAIL [LHG\_ORDERS@NJD.USCOURTS.GOV]**

Honorable Lois H. Goodman  
USDC, District of New Jersey  
Clarkson S. Fisher Federal Building & U.S. Courthouse  
402 East State Street  
Trenton, NJ 08608

**Fact discovery related to the current pleadings is extended through June 6, 2022. The parties shall complete all fact discovery within 90 days following the Court's decision on the outstanding Motion for Leave to Amend.**

**Re: *Edible IP, LLC v. World Media Group, LLC*  
Case No. 3:20-cv-19178-MAS-LHG**

Dear Magistrate Judge Goodman:

With fact discovery closing in this case on May 9, 2022 and World Media Group, LLC's Motion for Leave to File Second Amended Answer and Counterclaims ("Motion" or "Motion for Leave to Amend") [Doc. 52] still pending, the parties are writing to update the Court on their discovery activities.

The parties are working as diligently as they can on supplementation as it pertains to the claims, defenses, and counterclaims currently in the case; but at this point there will be little time before the May 9 close for dispute resolution or any follow up discussion. The parties respectfully ask the Court for another four weeks beyond May 9 to do cleanup discovery on the current pleadings.

In addition, whether the Court denies or grants World Media's Motion for Leave to Amend, the parties request that they be permitted to complete all remaining discovery on the current and the potential new claims within three months (90-days) of the Court's Order on the Motion for Leave to Amend. If the Court denies World Media's Motion, the parties would promptly complete discovery on the current pleadings. And, if the Court grants World Media's motion, the parties would promptly serve any written discovery directed to the amended claims, allow a sufficient time period of at least 30 days to respond to that written discovery and to produce responsive documents related to the amended claims, amend their corporate deposition notices to include topics directed to the amended claims, and get deposition dates on the calendar. The parties further request that dispositive motion deadlines run from the conclusion of the post-Order discovery period.

As previously discussed with the Court, in an effort to proceed efficiently and preserve resources, the parties would like to avoid the risk of having to produce key witnesses for depositions twice. The parties agree that the foregoing proposal achieves that end.

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May 5, 2022  
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We appreciate the Court's consideration of the parties' request.

Sincerely,

/s/ Stephen J. Steinlight / John M. Bowler

Stephen J. Steinlight / John M. Bowler

JMB:psk